



February 22, 2019

*Via Email strawbridge\_chambers@paed.uscourts.gov*

United States District Court  
Eastern District of Pennsylvania  
Honorable David R. Strawbridge  
601 Market Street  
Room 3-H  
Philadelphia, PA 19106

RE: Patricia McNulty v. The Middle East Forum, et al.  
No. 2:19-cv-05029

Dear Judge Strawbridge:

I write on behalf of Plaintiff, Patricia McNulty to notify the Court regarding Plaintiff's updated Written Responses to Defendants' First Request for Production of Documents. Please allow this correspondence to certify that Plaintiff, Patricia McNulty has provided Defendants with updated, amended Written Responses to Defendants' First Request for Production of Documents. These amended Responses are Plaintiff's attempt to cure any and all deficiencies Defendants raised to the Court in their February 5, 2021 correspondence.

As of February 22, 2021, Plaintiff has served upon Defendants, these updated, amended Written Responses to Defendants Request for Production of Documents.

Plaintiff also contacted Defendants in an effort to set up a meet and confer session on February 22, 2021. On February 22, 2021, Plaintiff's counsel sent two emails to Defendants requesting a meet and confer to discuss the outstanding discovery issues that were first raised by Defendants in Defendants' February 5, 2021 correspondence. While it has only been one (1) day, Defendants have not yet responded to Plaintiff's attempts to schedule a meet and confer.

Respectfully submitted on behalf of Plaintiff, Patricia McNulty.

Very Truly Yours,  
**DEREK SMITH LAW GROUP, PLLC**  
BY: /s/ Seth D. Carson  
Seth D. Carson, Esquire

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